

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SAUL SABINO,

Plaintiff,

-against-

CHAIRPERSON OF DIVISION OF NYS PAROLE, ET
AL.,

Defendants.

**DECLARATION OF
JESSE N. ZILINSKI IN
SUPPORT OF
DEFENDANT CITY
OF NEW YORK'S
MOTION TO DISMISS**

20-CV-5861 (EK) (JRC)

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JESSE N. ZILINSKI, declares pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

I am an Assistant Corporation Counsel in the office of the HON. SYLVIA O. HINDS-RADIX, Corporation Counsel of the City of New York, attorney for defendant the City of New York. I submit this declaration in support of Defendant City of New York's Motion to Dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. I am familiar with the facts and circumstances stated herein based upon personal knowledge, the books and records of the City of New York, and conversations with its agents and employees.

1. Annexed as Exhibit "A" is a true and accurate copy of the General Release executed by Plaintiff on January 9, 2021, as part of a settlement (Comptroller Claim Number 2019PI031256) with the City of New York in an unrelated matter, wherein Plaintiff agreed to discharge the City of New York and all past and present employees from any and all liability, claims, or rights of action alleging a violation of his civil rights from the beginning of the world to the date of the General Release. The General Release does not exclude the incident alleged herein.

2. Annexed as Exhibit "B" is a true and accurate copy of the General Release executed by Plaintiff on November 27, 2021, as part of a settlement (Comptroller Claim Number 2021PI006690) with the City of New York in an unrelated matter, wherein Plaintiff agreed to discharge the City of New York and all past and present employees from any and all liability, claims, or rights of action alleging a violation of his civil rights from the beginning of the world to the date of the General Release. The General Release does not exclude the incident alleged herein.

Dated: New York, New York
August 7, 2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel of the
City of New York
Attorney for Defendant City of New York
100 Church Street
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By:



Jesse N. Zilinski
Assistant Corporation Counsel

cc: **BY FIRST CLASS MAIL**
Saul Sabino, *Plaintiff Pro Se*
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BY ECF
Andrew Blancato
New York State Office of the Attorney General
Attorney for Defendant James Ogle